

Neel Chatterjee (SBN 173985)  
*nchatterjee@goodwinlaw.com*

**GOODWIN PROCTER LLP**  
135 Commonwealth Drive  
Menlo Park, California 94025  
Tel.: +1 650 752 3100  
Fax.: +1 650 853 1038

Brett Schuman (SBN 189247)  
*bschuman@goodwinlaw.com*

Shane Brun (SBN 179079)  
*sbrun@goodwinlaw.com*  
Rachel M. Walsh (SBN 250568)  
*rwalsh@goodwinlaw.com*

**GOODWIN PROCTER LLP**  
Three Embarcadero Center  
San Francisco, California 94111  
Tel.: +1 415 733 6000  
Fax.: +1 415 677 9041

Hong-An Vu (SBN 266268)  
*hvu@goodwinlaw.com*  
**GOODWIN PROCTER LLP**  
601 S. Figueroa Street, 41st Floor  
Los Angeles, California 90017  
Tel.: +1 213 426 2500  
Fax.: +1 213 623 1673

*Attorneys for Defendant: Otto Trucking LLC*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

Waymo LLC,

Plaintiff,

v.

Uber Technologies, Inc.; Ottomotto LLC;  
Otto Trucking LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF NEEL CHATTERJEE IN  
SUPPORT OF DEFENDANT OTTO  
TRUCKING'S MOTION TO FILE UNDER  
SEAL CERTAIN PORTIONS OF ITS  
MOTION IN LIMINE TO EXCLUDE  
TESTIMONY OF MR. BROWN AND MR.  
GUDJONSSON REGARDING  
PROTECTIONS OF WAYMO'S ALLEGED  
TRADE SECRETS**

Courtroom: 8 (19th Floor)

Judge: Hon. William Alsup

Filed/Lodged Concurrently with:

1. Admin. Mtn. to File Documents Under Seal
2. [Proposed] Order
3. Redacted/Unredacted Versions
4. Proof of Service

Trial: October 10, 2017

I, Neel Chatterjee, declare as follows:

1. I am a partner at the law firm of Goodwin Procter LLP, counsel of record for Defendant Otto Trucking LLC (“Otto Trucking”). I make this declaration based upon matters within my own personal knowledge and if called as a witness, I could and would competently testify to the matters set forth herein. I make this declaration in support of Defendant Otto Trucking’s Administrative Motion to File Under Seal Portions of its Motion in Limine to Exclude Testimony of Mr. Brown and Mr. Gudjonsson Regarding Protections of Waymo’s Alleged Trade Secrets (the “Brown and Gudjonsson Motion”).

2. I have reviewed the following documents and confirmed that only the portions identified below merit provisional sealing:

Document	Portions to Be Filed Under Seal
Otto Trucking’s Brown and Gudjonsson Motion	Highlighted Portions
Exhibit 1 to Vu Declaration	Entire Document
Exhibit 2 to Vu Declaration	Entire Document
Exhibit 3 to Vu Declaration	Entire Document
Exhibit 4 to Vu Declaration	Entire Document
Exhibit 5 to Vu Declaration	Entire Document
Exhibit 6 to Vu Declaration	Entire Document
Exhibit 7 to Vu Declaration	Entire Document
Exhibit 8 to Vu Declaration	Entire Document
Exhibit 9 to Vu Declaration	Highlighted Portions
Exhibit 10 to Vu Declaration	Highlighted Portions
Exhibit 12 to Vu Declaration	Entire Document
Exhibit 13 to Vu Declaration	Highlighted Portions
Exhibit 14 to Vu Declaration	Highlighted Portions
Exhibit 15 to Vu Declaration	Entire Document

Exhibit 16 to Vu Declaration	Entire Document
Exhibit 17 to Vu Declaration	Entire Document
Exhibit 18 to Vu Declaration	Entire Document
Exhibit 19 to Vu Declaration	Entire Document
Exhibit 20 to Vu Declaration	Entire Document
Exhibit 23 to Vu Declaration	Entire Document

3. The highlighted portions of the Brown and Gudjonsson Motion, the highlighted portions of Exhibits 9, 10, 13, and 14 to the Vu Declaration, and the entirety of Exhibits 1, 2, 3, 4, 6, 7, 8, 12, 15, 16, 17, 18, 19, 20 and 23 to the Vu Declaration contain information that Waymo has designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Protective Order in this case. Otto Trucking states no position about whether the confidentiality designations are appropriate. Otto Trucking anticipates that Waymo will file any necessary declarations to seal the above information pursuant to Local Rule 79-5.

4. Otto Trucking anticipates that Waymo will file any necessary declarations to seal the above information pursuant to Local Rule 79-5.

5. Otto Trucking’s request to seal is narrowly tailored to those portions of the Brown and Gudjonsson Motion that merit sealing.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 16th day of September, 2017 in Menlo Park, California.

/s/ Neel Chatterjee  
Neel Chatterjee